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Attorneys for Defendant
AMBRAKE CORPORATION

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:)	Chapter 11
)	
Delphi Corporation et al.,)	Case No. 05-44481 (RDD)
)	
)	
Debtors.)	(Jointly Administered)
)	

**OBJECTION TO NOTICE OF CURE AMOUNT
WITH RESPECT TO EXECUTORY CONTRACT TO BE ASSUMED OR ASSUMED
AND ASSIGNED UNDER PLAN OF REORGANIZATION**

Ambrake Corporation (“Ambrake”), by counsel, hereby submits this Objection (the “Objection”) to the Debtor’s Notice Of Cure Amount With Respect To Executory Contract To Be Assumed Or Assumed And Assigned Under Plan Of Reorganization dated January 29, 2008, (Docket No. 12375) (the “Cure Notice”). In support of this Objection, Ambrake respectfully states as follows:

1. On January 29, 2008, the Debtors filed the Cure Notice, a copy of which is attached hereto as Exhibit A. In the Cure Notice the Debtors indicate that they wish to assume or assume and assign certain executory contracts (hereinafter referred to as the “Purchase Orders”) between Ambrake and the Debtors. The Purchase Orders were identified on Exhibit 1 to the

Cure Notice along with the amounts which were alleged by the Debtors to be owing for prepetition arrearages (the "Cure Amounts") with respect to each of the Purchase Orders.

2. Ambrake hereby objects to the Cure Amounts as alleged by the Debtors on Exhibit 1 to the Cure Notice.

3. The Correct Cure Amounts with respect to the Purchase Orders, as documented in Ambrake's records, relevant portions of which are attached hereto as Exhibit B, are as follows:

Purchase Order	Debtors' Proposed Cure Amount	Correct Cure Amount
D0550035641	\$38,043.36	\$140,083.20
D0550053874	\$35,542.51	\$120,394.56
D0550070426	\$9,804.47	\$21,661.20
D0550070427	\$29,682.28	\$65,577.60
D0550003833	\$0.00	\$0.00
D0550061919	\$0.00	\$0.00

WHEREFORE, for the reasons set forth above, Ambrake respectfully requests that this Objection be sustained and that the Debtors be prohibited from assuming or assuming and assigning the Purchase Orders unless and until the Debtors cure the Debtors' defaults on the Purchase Orders by payment of the Correct Cure Amounts set forth above.

Dated: February 7, 2008

Respectfully submitted,

/s/ W. Robinson Beard

W. Robinson Beard (Ky. Bar No. 03960)

Admitted Pro Hac Vice

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Counsel for Akebono Corporation (North America)

CERTIFICATE OF SERVICE

I, W. Robinson Beard, certify that the foregoing Response was served via electronic mail or by overnight delivery to the parties listed on the following service list this the 7th day of February, 2008.

Delphi Corporation
5725 Delphi Drive
Troy, MI 48098
Attention: General Counsel

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For the Southern District of
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33 Whitehall Street Ste. 2100
New York, New York 10004
Attention: Alicia M. Leonhard

Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court for
the Southern District of New York
One Bowling Green, Room 632
New York, New York 10004

/s/ W. Robinson Beard
W. Robinson Beard